



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Charter Communications, Inc.  
Attn: Larry Christopher, Spectrum Reach  
221 Bolivar Street  
Jefferson City, MO 65101

**APR 24 2018**

RE: MUR 7106  
Spectrum Reach

Dear Mr. Christopher:

On September 6, 2016, the Federal Election Commission notified Spectrum Reach of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 6, 2018, the Commission found, on the basis of the information in the complaint, that there is no reason to believe Spectrum Reach violated 52 U.S.C. § 30125(e)(1)(A). Accordingly, the Commission closed its file in this matter as it pertains to Spectrum Reach. The Factual and Legal Analysis, explaining the Commission's findings, is enclosed.

The Commission reminds you that the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. This matter will become part of the public record within 30 days after the entire file is closed with respect to all other respondents involved. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Shanna Reulbach, the attorney assigned to this matter, at (202) 694-1638.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Y. Tran".

Lynn Y. Tran  
Assistant General Counsel

Enclosure  
Factual and Legal Analysis

**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: Spectrum Reach TM MUR: 7106

**I. INTRODUCTION**

This matter was generated by a Complaint filed with the Federal Election Commission (the "Commission") by Michelle C. Clay. In relevant part, the Complaint alleges that Spectrum Reach TM ("Spectrum Reach") violated the Federal Election Campaign Act of 1971, as amended (the "Act"), by receiving soft money for television commercials connected to a federal election.

**II. FACTUAL AND LEGAL ANALYSIS**

**A. Factual Background**

Maria Chappelle-Nadal has been a Missouri State Senator since 2010 and was a candidate for Missouri's First Congressional District during the 2016 election cycle. Citizens for Maria Chappelle-Nadal was her state candidate committee (the "State Committee"), and Chappelle-Nadal for Congress was her federal candidate committee (the "Federal Committee").<sup>1</sup>

The Complaint in this matter alleges that the State Committee, beginning in July 2016, paid Spectrum Reach \$14,450.85 for 1,119 television advertisements promoting Chappelle-Nadal's federal candidacy. The Complaint appears to argue that Spectrum Reach, a media vendor, violated the Act by receiving soft money in connection with Chappelle-Nadal's federal election.<sup>2</sup>

<sup>1</sup> CO31173: *Citizens for Maria Chappelle-Nadal*, MO. ETHICS COMM'N, [http://mec.mo.gov/MEC/Campaign\\_Finance/CF11\\_CommInfo.aspx](http://mec.mo.gov/MEC/Campaign_Finance/CF11_CommInfo.aspx) (last visited Jan. 30, 2017); Statement of Organization, Chappelle-Nadal for Congress (Oct. 6, 2015); Statement of Candidacy, Maria Chappelle-Nadal (Oct. 6, 2015).

<sup>2</sup> See 2<sup>nd</sup> Supp. Compl. at 1 (Aug. 30, 2016) & Attach. 1.

**B. Legal Analysis**

The Act prohibits federal candidates, their agents, and entities established, financed, maintained, or controlled by federal candidates from soliciting, receiving, directing, transferring, or spending funds in connection with any federal election unless the funds are in amounts and from sources permitted by the Act.<sup>3</sup>

Under Missouri law, candidates can accept unlimited contributions and contributions from corporations and labor unions.<sup>4</sup> Therefore, Missouri allows candidates to collect funds in excess of federal limitations and from sources prohibited by the Act.<sup>5</sup> Citizens for Maria Chappelle-Nadal's disclosure reports show that the State Committee accepted such soft money contributions.

However, based on evidence within the Commission's possession, it appears that the Federal Committee paid Spectrum Reach for the commercials. The Commission has information available establishing that Spectrum Reach erroneously billed the State Committee instead of the Federal Committee for the television advertisements. The State Committee wrote a check but realized the error and canceled it. The Federal Committee ultimately paid for the commercials, and Spectrum Reach sent the Federal Committee confirmation of the payment. A review of the Federal Committee's filings confirms that the Federal Committee reported the \$14,450 disbursement to Spectrum Reach on its 2016 October Quarterly Report.<sup>6</sup>

<sup>3</sup> 52 U.S.C. § 30125(e)(1)(A); *see also* 11 C.F.R. § 300.61.

<sup>4</sup> MO. REV. STAT. §§ 130.011-.160 (providing no contribution limit); *id.* § 130.029 (stating that corporations and labor organizations may make contributions).

<sup>5</sup> 52 U.S.C. § 30116(a)(1)(A) (providing the individual contribution limit); *Contribution Limits for 2015-2016 Federal Elections*, FED. ELECTION COMM'N, <http://www.fec.gov/info/contriblimitschart1516.pdf> (last visited Jan. 30, 2017) (stating that the indexed individual contribution limit to a candidate and her authorized committee is \$2,700 per person, per election); *see also* 52 U.S.C. § 30118(a) (prohibiting corporations and labor unions from contributing to candidates and political committees).

<sup>6</sup> 2016 October Quarterly Report, Chappelle-Nadal for Congress (Oct. 15, 2016).

**4 § 30125(e)(1)(A)..**